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June 17, 2005

*VIA ECFS*

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, DC 20554

**Re: Ex Parte Communication**  
WT Docket No. 02-353  
Service Rules for Advanced Wireless Services in the 1.7 and 2.1  
GHz Bands

Dear Ms. Dortch:

On June 15, 2005, I received a phone call from FCC Wireless Telecommunications Bureau staff Blaise Scinto, Peter Corea, and Jennifer Tomchin concerning the views of SunCom Wireless Operating Company, L.L.C. ("SunCom") regarding band plan issues raised in the above-captioned Advanced Wireless Services ("AWS") docket. 1/ Specifically, the FCC staff asked questions about the AWS band plan and frequency block configuration preferences of a regional wireless carrier such as SunCom.

In response, SunCom offers the following observations:

First, SunCom agrees with T-Mobile USA, Inc. ("T-Mobile") that the AWS band plan should "allow carriers of varying sizes to aggregate spectrum to better serve their customers" and that "this objective can be best achieved by assigning six licenses within the AWS band and ensuring that spectrum blocks

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1/ See Service Rules for Advanced Wireless Services in the 1.7 and 2.1 GHz Bands, *Report and Order*, 18 FCC Rcd 25612 (2003) ("Report and Order").

allocated by regional economic area groupings (REAGs) do not exceed 40 MHz in the aggregate.” [2/](#)

Second, at this time, SunCom does not plan to bid for REAGs in the AWS auction, but it is interested in bidding for EAs and MSAs/RSAs. Therefore, SunCom prefers an AWS band plan with EAs located adjacent to other EAs as well as MSAs/RSAs. SunCom would be most interested in a band plan configuration with adjacent EA blocks, which is not contemplated by the FCC’s current AWS band plan, the T-Mobile-Rural Telecommunications Group (“RTG”) proposal, or the recent Verizon Wireless band plan proposal. [3/](#) However, SunCom is comfortable with the location of Block D (MSA/RSA) under the current T-Mobile-RTG proposal.

As SunCom has previously stated, the AWS band plan should create realistic opportunities for regional and local carriers operating in smaller and underserved markets to offer their subscribers new advanced services. [4/](#) Granting these carriers access to affordable spectrum blocks more appropriate for their needs would promote local competition between wireless carriers of all sizes, without thwarting the ability of larger carriers to aggregate licenses and combine the smaller spectrum blocks.

This letter is being filed electronically pursuant to Section 1.1206(b) of the FCC’s rules, and please contact me if there are any questions.

Sincerely,

/s/ Michele C. Farquhar

Michele C. Farquhar  
Counsel to SunCom Wireless Operating  
Company, L.L.C.

cc: Blaise Scinto  
Peter Corea  
Jennifer Tomchin

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[2/](#) See Ex Parte Letter from Kathleen Ham, T-Mobile, filed on June 14, 2005.

[3/](#) See Ex Parte Letter from Charla Rath, Verizon Wireless, filed on June 6, 2005.

[4/](#) See Ex Parte Letter from Michele Farquhar, Counsel to SunCom, filed on May 20, 2005.